RE: ***VENTURE TECHNOLOGIES 039-15364-00498***
TO: Interested Parties / Applicant

February 3, 2003

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision - Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, Indiana 46204, **within thirty (30) days from the date of this notice**. The filing for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision or other order for which you seek review by permit number, the name of the applicant, location, the date of this notice, and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

FNTVOP.WPD
8-21-02

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
e make Indiana a cleaner, healthier place to live.

Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

(317) 232-8603
(800) 451-6027
www.state.in.us/idem

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Venture Technologies, LLC
2501 Jeanwood Drive
Elkhart, IN 46514

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-15364-00498	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 3, 2003 Expiration Date: February 3, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary trailer frame fabrication and coating source.

Responsible Official:	Vice President of Manufacturing, Venture Technologies, LLC
Source Address:	2501 Jeanwood Drive, Elkhart, IN 46514
Mailing Address:	P.O. Box 189, Elkhart, IN 46515
Source Phone Number:	(574) 266-7356
SIC Code:	3499, 3714
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) spray coating operation, constructed in 2001, exhausting to stacks PB1, PB2, PB3, and BO1, consisting of the following equipment:

(1) one (1) paint booth, with a maximum capacity of four (4) commercial and one (1) military metal trailer frames per hour, with emissions controlled by dry filters, and

(2) one (1) flash-off/cool down area, and

(3) one (1) natural gas-fired bake/cure oven with a maximum heat input capacity of 3.5 MMBtu/hr.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) aqueous pretreatment operation, constructed in 1998, exhausting to stacks S1 and S2, and vents EF1 and EF2, consisting of the following equipment:

(1) three (3) dip tanks, with an aggregate maximum capacity of 166.8 pounds of aqueous cleaner, aqueous rinse and phosphate solution per hour (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)), and

(2) two (2) natural gas-fired 7.0 MMBtu/hr boilers used to provide hot water (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 6-2-4]

(b) One (1) epoxy and acrylic electrocoating operation, constructed in 1998, exhausting to vents EF1 through EF5 and stacks S3 through S6, consisting of the following equipment:

(1) fifteen (15) dip tanks, with an aggregate maximum capacity of 181.2 pounds resin per hour, 20 trailer frames per hour, 40 metal parts per hour, and 166.8 pounds of aqueous cleaner per hour, with an epoxy or acrylic dip application method (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)),

(2) one (1) cool-down area,

(3) one (1) natural gas-fired E-coat cure oven, with a maximum heat input capacity of 1.9 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)) [326 IAC 6-3-2], and

(4) one (1) natural gas-fired burn-off oven, with a maximum heat input capacity of 1.6 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 4-2]

(c) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 1.0 ton per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Eighty-five (85) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb of wire per hour per station. [326 IAC 6-3-2]

(d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, an woodworking operations. [326 IAC 6-3-2]

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, and soldering equipment. [326 IAC 6-3-2(c)]

(f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of

requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V

Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:

Condition D.1.1(a), CP/MSOP 039-12883-00498, issued March 20, 2001, stating that the particulate matter from the spray coating operation shall be limited based on the equations contained therein, has not been incorporated into this permit because 326 IAC 6-3-2 was revised to state that particulate matter emissions from a spray coating operation are no longer specifically limited. Instead the rule states that a particulate matter control device must be used. The revisions to 326 IAC 6-3-2 were adopted February 6, 2002, and became effective on June 12, 2002.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR Subpart P] [326 IAC 6-3-2(e)]

(a) Pursuant to 40 CFR Subpart P, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5-3(b), the source has requested to be exempted from this rule. Electro-Coat Technologies generates an estimated 0.44 tons per year fugitive particulate matter from vehicular traffic. As a result, IDEM agrees that the source does not have to limit fugitive particulate matter emissions pursuant to 326 IAC 6-5.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing and order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within sixty (60) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within sixty (60) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial sixty (60) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so

long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each

deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Spray coating operation

(a) One (1) spray coating operation, constructed in 2001, exhausting to stacks PB1, PB2, PB3, and BO1, consisting of the following equipment:

(1) one (1) paint booth, with a maximum capacity of four (4) commercial and one (1) military metal trailer frames per hour, with emissions controlled by dry filters, and

(2) one (1) flash-off/cool down area, and

(3) one (1) natural gas-fired bake/cure oven with a maximum heat input capacity of 3.5 MMBtu/hr.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

(a) Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, and 40 CFR 52 Subpart P, the particulate matter (PM) from the paint booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the 3.5 MMBtu/hr bake/cure oven used in the spray coating operation shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

D.1.2 Volatile Organic Compounds (VOC) from Miscellaneous Metal Coating [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components in the spray coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings. Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.3 General Provisions Relating to VOC Rules: Military Specifications [326 IAC 8-1-7]

If emission limitations set forth in 326 IAC 8 conflict with military specifications, the owner or operator of a source may petition the commissioner to have military specifications be the

controlling limitation. If the commissioner approves the petition, the modified limitation shall be submitted to the U.S. EPA as a SIP revision.

D.1.4 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]

Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, any change or modification which may increase any single HAP potential emissions to 10 tons per year or more, or combination of HAPs potential emissions to 25 tons per year or more, shall require prior approval by the IDEM, OAQ before such changes may take place.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit for these facilities and any control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, and 326 IAC 6-3-2(d), the spray booth shall be controlled by a dry particulate filter, and the control device shall be operated in accordance with manufacturer’s specifications.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters used to control emissions from the spray coating operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks PB1 and PB2 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Conditions D.1.2 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the HAP emission limits established in Conditions D.1.2 and D.1.4.

(1) The VOC (and HAP) content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC (and HAP) content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC (and HAP) usage for each month; and

(6) The weight of VOCs (and HAPs) emitted for each compliance period.

(b) To document compliance with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

(a) One (1) aqueous pretreatment operation, constructed in 1998, exhausting to stacks S1 and S2, and vents EF1 and EF2, consisting of the following equipment:

(1) three (3) dip tanks, with an aggregate maximum capacity of 166.8 pounds of aqueous cleaner, aqueous rinse and phosphate solution per hour (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)), and

(2) two (2) natural gas-fired 7.0 MMBtu/hr boilers used to provide hot water (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 6-2-4]

(b) One (1) epoxy and acrylic electrocoating operation, constructed in 1998, exhausting to vents EF1 through EF5 and stacks S3 through S6, consisting of the following equipment:

(1) fifteen (15) dip tanks, with an aggregate maximum capacity of 181.2 pounds resin per hour, 20 trailer frames per hour, 40 metal parts per hour, and 166.8 pounds of aqueous cleaner per hour, with an epoxy or acrylic dip application method (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)),

(2) one (1) cool-down area,

(3) one (1) natural gas-fired E-coat cure oven, with a maximum heat input capacity of 1.9 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)) [326 IAC 6-3-2], and

(4) one (1) natural gas-fired burn-off oven, with a maximum heat input capacity of 1.6 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 4-2]

(c) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 10 tons per year SO2, NOx, or VOC, 0.2 tons per year Pb, 1.0 tons per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Eighty-five (85) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb of wire per hour per station. [326 IAC 6-3-2]

(d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, an woodworking operations. [326 IAC 6-3-2]

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2(c)]

(f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-3-2]

(a) Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, CP 039-9800-00498, issued on August 13, 1998, and 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the e-coat curing operations shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

(b) Pursuant to CP 039-9800-00498, issued on August 13, 1998, and 326 IAC 6-3-2(e), the allowable particulate emission rate from the eighty-five (85) MIG (Metal Inert Gas) welding stations shall not exceed 0.551 pounds per hour for a process weight rate of less than 100 pounds per hour.

(c) Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from the insignificant soldering, cutting, brazing, grinding, and machining operations shall not exceed 0.551 pounds per hour for a process weight rate of less than 100 pounds per hour.

D.2.2 Particulate Matter (PM) from Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the two (2) natural gas-fired 7.0 MMBtu/hr boilers used in conjunction with the pretreatment operation, shall each not exceed 0.55 pounds per MMBtu energy input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used (Q = 14.0 MMBtu/hr).

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning degreasing (item f in facility descriptions) operations constructed after January 1, 1980, the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements; and

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility (item f in facility description) construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.5 Incinerator Requirements [326 IAC 4-2]

Pursuant to 326 IAC 4-2, the burn-off oven used in conjunction with the electrocoating operation shall:

(a) Consist of primary and secondary chambers or the equivalent;

(b) Be equipped with a primary burner unless burning wood products;

(c) Comply with 326 IAC 5-1 and 326 IAC 2;

(d) Be maintained properly as specified by the manufacturer and approved by the commissioner;

(e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;

(f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;

(g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;

(h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and

(i) Not create a nuisance or fire hazard.

If the Permittee fails to comply with (a) through (i) above, the burning shall be terminated immediately.

D.2.6 Volatile Organic Compounds (VOC) from Miscellaneous Metal Coating [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components in the electro-coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings. Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.7 General Provisions Relating to VOC Rules: Military Specifications [326 IAC 8-1-7]

If emission limitations set forth in 326 IAC 8 conflict with military specifications, the owner or operator of a source may petition the commissioner to have military specifications be the controlling limitation. If the commissioner approves the petition, the modified limitation shall be submitted to the U.S. EPA as a SIP revision.

D.2.8 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]

Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, any change or modification which may increase any single HAP potential emissions to 10 tons per year or more, or combination of HAPs potential emissions to 25 tons per year or more, from the electro-coating operation shall require prior approval by the IDEM, OAQ before such changes may take place.

Compliance Determination Requirements

D.2.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.2.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Conditions D.2.6 and D.2.8, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and the HAP emission limits established in Conditions D.2.6 and D.2.8.

(1) The VOC (and HAP) content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC (and HAP) content of the coatings used for each month;

(4) The total VOC (and HAP) usage for each month; and

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Venture Technologies, LLC
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Mailing Address: P.O. Box 189, Elkhart, IN 46515
Part 70 Permit No.: 039-15364-00498

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Venture Technologies, LLC
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Mailing Address: P.O. Box 189, Elkhart, IN 46515
Part 70 Permit No.: 039-15364-00498

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Data Section

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Venture Technologies, LLC
Source Address: 2501 Jeanwood Drive, Elkhart, IN 46514
Mailing Address: P.O. Box 189, Elkhart, IN 46515
Part 70 Permit No.: 039-15364-00498

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

February 3, 2003

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Venture Technologies
Source Location:	2501 Jeanwood Drive, Elkhart, IN 46514
County:	Elkhart
SIC Code:	3499, 3714
Operation Permit No.:	T039-15364-00498
Permit Reviewer:	ERG/BS

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Electro-Coat Technologies relating to the operation of trailer frame fabrication and coating equipment.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) spray coating operation, constructed in 2001, exhausting to stacks PB1, PB2, PB3, and BO1, consisting of the following equipment:

(1) one (1) paint booth, with a maximum capacity of four (4) commercial and one (1) military metal trailer frames per hour, with emissions controlled by dry filters, and

(2) one (1) flash-off/cool down area, and

(3) one (1) natural gas-fired bake/cure oven with a maximum heat input capacity of 3.5 MMBtu/hr.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) One (1) aqueous pretreatment operation, constructed in 1998, exhausting to stacks S1 and S2, and vents EF1 and EF2, consisting of the following equipment:

(1) three (3) dip tanks, with an aggregate maximum capacity of 166.8 pounds of aqueous cleaner, aqueous rinse and phosphate solution per hour (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)), and

(2) two (2) natural gas-fired 7.0 MMBtu/hr boilers used to provide hot water (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 6-2-4]

(b) One (1) epoxy and acrylic electrocoating operation, constructed in 1998, exhausting to vents EF1 through EF5 and stacks S3 through S6, consisting of the following equipment:

(1) fifteen (15) dip tanks, with an aggregate maximum capacity of 181.2 pounds resin per hour, 20 trailer frames per hour, 40 metal parts per hour, and 166.8 pounds of aqueous cleaner per hour, with an epoxy or acrylic dip application method (insignificant per 326 IAC 2-7-1(21)(G)(ix)(DD)),

(2) one (1) cool-down area,

(3) one (1) natural gas-fired E-coat cure oven, with a maximum heat input capacity of 1.9 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)) [326 IAC 6-3-2], and

(4) one (1) natural gas-fired burn-off oven, with a maximum heat input capacity of 1.6 MMBtu/hr (insignificant per 326 IAC 2-7-1(21)(G)(i)(AA)(aa)). [326 IAC 4-2]

(c) Activities with emissions equal to or less than the following thresholds: 5 tons per year PM or PM10, 1.0 ton per year of a single HAP, or 2.5 tons per year of any combination of HAPs: Eighty-five (85) MIG (Metal Inert Gas) welding stations with a capacity of 0.59 lb of wire per hour per station. [326 IAC 6-3-2]

(d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, an woodworking operations. [326 IAC 6-3-2]

(e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, and soldering equipment. [326 IAC 6-3-2]

(f) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

(g) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(h) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: Small curing ovens, space heaters, make up heaters, and water heaters with an aggregate heat input capacity of 47.4 MMBtu/hr.

(i) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(j) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

(k) Combustion source flame safety purging on startup.

(l) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(m) Machining where an aqueous cutting coolant continuously floods the machining interface.

(n) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 °C (100°F) or;

(2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(o) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

(p) Closed loop heating and cooling systems.

(q) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.

(r) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(s) Any operation using aqueous solutions containing less than 1% by weight VOCs excluding HAPs.

(t) Heat exchanger cleaning and repair.

(u) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(v) Process vessel degassing and cleaning to prepare for internal repairs.

(w) Filter or coalescer media changeout.

(x) Purging of gas lines and vessels that are related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(y) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(z) On-site fire and emergency response training approved by the department.

Existing Approvals

The source has constructed and has been operating under the following previous approvals:

(a) CP 039-9800-00498, issued on August 13, 1998;

(b) A 039-12763-00498, issued on October 24, 2000;

(c) CP/MSOP 039-12883-00498, issued March 20, 2001; and

(d) Notice only change 039-15809-00498, issued April 27, 2002.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this Part 70 permit:

(a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

The source became a major source following construction of the spray coating operation in 2001. Upon issuance of the MSOP that permitted the construction and operation of the spray coating operation, the source was informed that it would need to submit an application for a Part 70 permit. An administratively complete Part 70 permit application for the purposes of this review was received on March 11, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A (pages 1 through 5) of this document for detailed emissions calculations.

Unrestricted Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	35
PM-10	35
SO_2	0.2

VOC	196
CO	23
NO_x	27

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Ethylbenzene	0.16
HMDI	0.3
Manganese	0.11
Styrene	6.33
Glycol Ether	9.59
Xylene	0.57
TOTAL	***17.1***

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than or ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7 with respect to HAPs.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 AND since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions from vehicular traffic on paved roads are not counted toward determination of PSD applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 (indicate the year of the most recent emission data) OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM-10	0.17
SO_2	0.02
VOC	7.35
CO	0.55
NO_x	2.77
HAP (specify)	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Pretreatment operation (1)	0.47	0.47	0.04	0.34	5.15	6.13	Negl.
Electro-coating operation (2)	0.12	0.12	0.01	71.8	1.29	1.53	0.65
Spray coating operation (3)	8.06	8.06	0.01	122.4	1.29	1.53	16.3
Insignificant welding	1.2	1.2	0	0	0	0	0.11
Insignificant space heating	1.34	1.34	0.11	0.97	14.86	17.7	Negl.
Total Emissions	11.2	11.2	0.17	195.5	22.6	26.9	17.1

Negl. - Negligible
(1) Emissions from the pretreatment operation are the result of natural gas combustion by two natural gas-fired 7.0 MMBtu/hr boilers. Pursuant to 326 IAC 6-2-4, the particulate matter emissions from each boiler shall not exceed 0.55 pounds per MMBtu.
(2) Emissions from the electro-coating operation are the result of natural gas combustion from two curing ovens and the dip application method used to coat the trailer frames and metal parts. Pursuant to 326 IAC 8-2-9, the VOC content of coating applied to the metal components in the electro-coating operations shall be limited to 3.5 pounds of VOCs per gallon of coating less water.
(3) Emissions from the spray coating operation are the result of natural gas combustion from a curing oven and the spray application method used to coat the trailer frames and metal parts. Pursuant to 326 IAC 8-2-9, the VOC content of coating applied to the metal components in the spray coating operations shall be limited to 3.5 pounds of VOCs per gallon of coating less water.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 AND since there are no applicable New Source Performance Standards that were in effect

on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This source does not involve a pollutant-specific emissions unit:

(1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and

(2) that is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the requirements of 40 CFR part 64, Compliance Assurance Monitoring, are not applicable.

(b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

The boilers in operation at this source are not subject to the New Source Performance Standard, 326 IAC 12, 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Commercial-Industrial-Institutional Steam Generating Units) because they have a heat input capacity less than 10 MMBtu/hr and are not used to produce steam.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

The insignificant degreasing operations at this source are not subject to 326 IAC 12, 40 CFR Part 63, Subpart T (Halogenated Solvent Cleaning) because the solvents used do not contain halogenated HAP solvents.

The electrocoating operation at this source are not subject to 326 IAC 14, 40 CFR Part 63, Subpart N (National Emission Standards for Chromium Electroplating) because it does not perform electroplating operations and is not a major source of HAPs.

(d) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source is not a major source of HAPs (i.e., the source has the potential to emit less than 10 tons per year of a single HAP and less than 25 tons per year of any combination of HAPs).

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The source, originally constructed in 1998, is located in Elkhart County which is designated as an attainment area for PM-10, SO_2, ozone, NO_x, CO, and lead. The source received CP/MSOP 039-12883-00498 on March 20, 2001, for the addition of a spray coating operation; the only modificatin since the original construction. The source has, and has always had, a potential to emit less than 250 tons per year of any criteria pollutant and is not in '1 of the 28' source categories with a 100 tpy PSD major threshold. As a result, the source is a PSD minor source for all criteria pollutants.

326 IAC 2-4.1 (Hazardous Air Pollutants)

This source was constructed after July 27, 1997. However, pursuant to 326 IAC 2-4.1-1, this source is not subject to the requirements of 326 IAC 2-4.1 (Hazardous Air Pollutants) because the source's potential to emit a single HAP, or any combination of HAPs, is less than ten (10) tons and twenty-five (25) tons per year, respectively.

Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, any change or modification which may increase any single HAP potential emissions to 10 tons per year or more, or combination of HAPs potential emissions to 25 tons per year or more, shall require prior approval by OAQ before such changes may take place.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1st of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source has not added a facility which generates fugitive particulate emissions greater than 25 tons per year. Paved roads are the only source of fugitive particulate matter at this source and generate an estimated 0.44 tons per year fugitive particulate matter from vehicular traffic. As a result, the requirements of 326 IAC 6-5 are not applicable to this source.

State Rule Applicability - Spray Coating Operation

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the

revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

326 IAC 6-3-2 (Particulate)

(a) Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001 and 40 CFR 52 Subpart P, the particulate matter (PM) from the paint booth shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Under the rule revision, particulate from surface coating shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

(b) Pursuant to 326 IAC 6-3-2(e), the particulate emission rate from the 3.5 MMBtu/hr bake/cure oven used in the spray coating operation shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

326 IAC 8-2-9 (Volatile Organic Compounds: Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components in the spray coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the information provided in the permit application and the MSDS submitted by the source, the electro-coating operation and the paint booth are in compliance with this requirement.

State Rule Applicability - Specifically Regulated Insignificant Activity: Aqueous Pretreatment

326 IAC 6-2-4 (Particulate Matter from Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4, the particulate matter emissions from the two (2) natural gas-fired 7.0 MMBtu/hr boilers used in the pretreatment operation, shall each not exceed 0.55 pounds per MMBtu energy input.

This limitation is based on the following equation:

$Pt = \frac{1.09}{Q^{0.26}}$

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. (Q = 14.0 MMBtu/hr).

State Rule Applicability - Specifically Regulated Insignificant Activity: Epoxy and Acrylic Electrocoating

326 IAC 4-2 (Incineration)

The 1.6 MMBtu/hr burn-off oven is subject to 326 IAC 4-2 because it is used to incinerate residual acrylic and epoxy coating from parts of the conveyors used in the electrocoating operation.

Pursuant to 326 IAC 4-2, the burn-off oven used in the electrocoating operation shall:

(a) Consist of primary and secondary chambers or the equivalent;

(b) Be equipped with a primary burner unless burning wood products;

(c) Comply with 326 IAC 5-1 and 326 IAC 2;

(d) Be maintained properly as specified by the manufacturer and approved by the commissioner;

(e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;

(f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;

(g) Be operated so that emissions of hazardous material including but not limited to viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;

(h) Not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard condition corrected to fifty percent (50%) excess air; and

(i) Not create a nuisance or fire hazard.

If the Permittee fails to comply with (a) through (i) above, the burning shall be terminated immediately.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-1(b)(2), the 1.6 MMBtu/hr burn-off oven, which is part of the electrocoating operation, is not subject to the requirements of 326 6-3-2.

Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, CP 039-9800-00498, issued on August 13, 1998, and 326 IAC 6-3-2, the allowable particulate emission rate from the E-coat cure oven used in the electrocoating operation shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 8-2-9 (Volatile Organic Compounds: Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components in the electrocoating

operation shall not exceed 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the information provided in the permit application and the MSDS submitted by the source, the electro-coating operation and the paint booth are in compliance with this requirement.

State Rule Applicability - Specifically Regulated Insignificant Activity: Eighty-five (85) MIG welding stations

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, CP 039-9800-00498, issued on August 13, 1998, and 326 IAC 6-3-2(e)(2), the allowable particulate emission rate from the eighty-five (85) MIG (Metal Inert Gas) welding stations shall not exceed 0.551 pounds per hour (in aggregate) for a process weight rate of less than 100 pounds per hour (in aggregate).

State Rule Applicability - Specifically Regulated Insignificant Activity: Grinding, Machining, Brazing, Cutting, and Soldering Equipment

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emission rate from the insignificant grinding, machining soldering, cutting, and brazing operations shall not exceed 0.551 pounds per hour for a process weight rate of less than 100 pounds per hour.

State Rule Applicability - Specifically Regulated Insignificant Activity: Degreasing Operations

326 IAC 8-3-2 (Volatile Organic Compounds)

The degreasing operations conducted at this source, located in Elkhart County, were constructed after January 1, 1980. Pursuant to 326 IAC 8-3-2, the insignificant degreasing operations are subject to the requirements of this rule. The owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Volatile Organic Compounds)

The degreasing operations conducted at this source, located in Elkhart County, were constructed after July 1, 1990. Pursuant to 326 IAC 8-3-5, the insignificant degreasing operations are subject to the requirements of this rule. The owner or operator shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ($48.9^{O}C$) (one hundred twenty degrees Fahrenheit ($120^{O}F$)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(7) Close the cover whenever articles are not being handled in the degreaser.

(8) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(9) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

State Rule Applicability - Specifically Regulated Insignificant Activity: Paved Roads

326 IAC 6-4 (Fugitive Dust)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

Testing Requirements

VOC is the major pollutant emitted by the source. There are no VOC emission limitations with which the source must comply. There is only the VOC content limitation of 326 IAC 8-2-9. The source does not use any VOC control devices to comply with this rule. Material Safety Data Sheets and other documentation can verify compliance with 326 IAC 8-2-9. As a result, there are no testing requirements for any facilities located at this source.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The spray coating operation has applicable compliance monitoring conditions as specified below:

   (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters used to control emissions from the spray coating operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks PB1 and PB2 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

   (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance

Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3-2 and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this trailer frame fabrication and coating source shall be subject to the conditions of the attached proposed Part 70 Permit No. T039-15364-00498.

February 3, 2003

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Title V Part 70 Operating Permit

Source Name:	Venture Technologies, LLC
Source Location:	2501 Jeanwood Drive, Elkhart, IN 46514
County:	Elkhart
SIC Code:	3499, 3714
Operation Permit No.:	T039-15364-00498
Permit Reviewer:	ERG/BS

On December 3, 2002, the Office of Air Quality (OAQ) had a notice published in the *Elkhart Truth* stating that Venture Technologies, LLC had applied for a Title V Part 70 Operating Permit to operate a trailer frame fabrication and coating plant. The notice also stated that the OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 26, 2002, Mike Athy of Venture Technologies, LLC provided comments on the proposed Title V Operating Permit. The following is a summary of the comments and responses to those comments including any changes to the permit. The Table Of Contents has been modified, if applicable, to reflect these changes.

Comment 1:

Note that the source also paints military vehicle parts and components. As a result, sections D.1 and D.2 should be revised to indicate that the source may follow the provisions of 326 IAC 8-1-7 if needed to meet military specifications.

Response to Comment 1:

The following conditions have been added to the permit to incorporate the provisions of 326 IAC 8-1-7:

D.1.3 General Provisions Relating to VOC Rules: Military Specifications [326 IAC 8-1-7]

If emission limitations set forth in 326 IAC 8 conflict with military specifications, the owner or operator of a source may petition the commissioner to have military specifications be the controlling limitation. If the commissioner approves the petition, the modified limitation shall be submitted to the U.S. EPA as a SIP revision.

D.2.7 General Provisions Relating to VOC Rules: Military Specifications [326 IAC 8-1-7]

If emission limitations set forth in 326 IAC 8 conflict with military specifications, the owner or operator of a source may petition the commissioner to have military specifications be the controlling limitation. If the commissioner approves the petition, the modified limitation shall be submitted to the U.S. EPA as a SIP revision.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Condition D.1.2 refers to the electro-coating operation which is identified in section D.2. As a result, Condition D.1.2 has been modified to refer only to the spray coating operation. Conditions D.2.6, D.2.9, and D.2.10 have been added to ensure that the electro-coating operation complies with the requirements of 326 IAC 8-2-9. Condition D.2.8 was added to clarify that an increase in HAP emissions above 10 tons per year for a single HAP and 25 tons per year for any combination of HAPs would require approval by the OAQ.

D.1.2 Volatile Organic Compounds (VOC) from Miscellaneous Metal Coating [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components in the ~~electro-coating operations or~~ spray coating operation~~s~~ shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings. Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.6 Volatile Organic Compounds (VOC) from Miscellaneous Metal Coating [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating applied to the metal components in the electro-coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings. Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.8 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1]

Pursuant to CP/MSOP 039-12883-00498, issued March 20, 2001, any change or modification which may increase any single HAP potential emissions to 10 tons per year or more, or combination of HAPs potential emissions to 25 tons per year or more, from the electro-coating operation shall require prior approval by the IDEM, OAQ before such changes may take place.

Compliance Determination Requirements

D.2.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.2.6 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Conditions D.2.6 and D.2.8, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content and the HAP emission limits established in Conditions D.2.6 and D.2.8.

(1) The VOC (and HAP) content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC (and HAP) content of the coatings used for each month;

(4) The total VOC (and HAP) usage for each month; and

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations
Company Name: Venture Technologies
Address City IN Zip: 53375 County Road 13, Elkhart, IN 46515
Permit #: T039-15364-00498
Reviewer: ERG/BS
Date: October 17, 2002

Process/Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Electro-coating of Trailer Frames																
Paste CP639J	9.30	59.00%	46.70%	12.30%	51.80%	36.00%	0.07000	20.000	2.37	1.14	1.60	38.44	7.01	0.00	3.18	100%
Resin CR935	8.65	78.00%	69.50%	8.50%	72.10%	25.00%	0.93000	20.000	2.64	0.74	13.68	328.22	59.90	0.00	2.94	100%
												subtotal	66.91	0.00		
Electro-coating of Metal Parts																
Epoxy CF665-415	9.20	60.00%	59.70%	0.30%	65.90%	34.10%	1.00000	40.000	0.08	0.03	1.10	26.50	4.84	0.00	0.08	100%
												subtotal	4.84	0.00		
Spray Coating of Commercial Trailers																
SW F88B141	8.02	42.40%	0.00%	42.40%	0.00%	53.60%	1.50000	4.000	3.40	3.40	20.40	489.67	89.36	6.07	6.34	95%
SW Hardener (V66V29)	8.85	25.00%	0.00%	25.00%	0.00%	52.00%	0.19000	4.000	2.21	2.21	1.68	40.36	7.36	1.10	4.25	95%
SW Accelerator (V66VB11)	7.03	95.50%	0.00%	95.50%	0.00%	52.00%	0.00900	4.000	6.71	6.71	0.24	5.80	1.06	0.00	12.91	95%
Clean up solvent	6.75	100.00%	0.00%	100.00%	0.00%	0.00%	0.10000	4.000	6.75	6.75	2.70	64.80	11.83	na	na	na
												subtotal	109.61	7.18		
Spray Coating of Military Trailers																
383 Zenthane	10.10	33.80%	0.00%	33.80%	0.00%	51.00%	0.60000	1.000	3.41	3.41	2.05	49.16	8.97	0.88	6.69	95%
MAK Thinner	6.75	100.00%	0.00%	100.00%	0.00%	0.00%	0.02800	1.000	6.75	6.75	0.19	4.54	0.83	na	na	na
Clean up solvent	6.75	100.00%	0.00%	100.00%	0.00%	0.00%	0.10000	1.000	6.75	6.75	0.68	16.20	2.96	na	na	na
												subtotal	12.76	0.88		
												Surface Coating Operations Total	**194.12**	**8.06**		

Note that the transfer efficiency used is guarenteed by the manufacturer of the paint booth. The electrocoating process is a dip application process that results in zero PM emissions

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
HAP Emissions
From Surface Coating Operations
Company Name: Venture Technologies
Address City IN Zip: 53375 County Road 13, Elkhart, IN 46515
Permit #: T039-15364-00498
Reviewer: ERG/BS
Date: October 17, 2002

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ether	Weight % Styrene	Weight % Ethyl Benzene	Weight % Methyl Isobutyl Ketone	Weight % HMDI	Weight % Xylene	Glycol Ether Emissions (ton/yr)	Styrene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methyl Isobutyl Ketone Emissions (ton/yr)	HMDI Emissions (ton/yr)	Xylene Emissions (ton/yr)
Paste CP639J	9.30	0.07000	20.000	1.14%	0.00%	0.00%	0.00%	0.00%	0.00%	0.65	0.00	0.00	0.00	0.00	0.00
Epoxy CF665-415	9.20	1.00000	40.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
SW F88B141	8.03	1.50000	4.000	4.00%	3.00%	0.00%	0.00%	0.00%	0.00%	8.44	6.33	0.00	0.00	0.00	0.00
SW Hardener (V66V29)	8.85	0.19000	4.000	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00	0.00	0.00	0.00	0.29	0.00
SW Accelerator (V66VB11)	7.03	0.00900	4.000	0.00%	0.00%	9.00%	36.00%	0.00%	51.00%	0.00	0.00	0.10	0.00	0.00	0.57
383 Zenthane	10.10	0.60000	1.000	1.88%	0.00%	0.23%	4.54%	0.04%	0.00%	0.50	0.00	0.06	0.00	0.01	0.00
MAK Thinner	6.75	0.02800	1.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Clean up solvent	6.75	0.10000	5.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00
Total State Potential Emissions									**subtotals**	**9.59**	**6.33**	**0.16**	**0.00**	**0.30**	**0.57**
									TOTAL	**16.95**					

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: **Venture Technologies**
Address City IN Zip: **53375 County Road 13, Elkhart, IN 46515**
Permit Number: **T039-15364-00498**
Reviewer: **ERG/BS**
Date: **October 17, 2002**

Total Source Heat Input Capacity* MMBtu/hr	Potential Throughput MMCF/yr
61.4	537.9

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	2.0	2.0	0.2	26.9	1.5	22.6

* Capacity Breakdown: 7.0 MMBtu/hr boiler, 7.0 MMBtu/hr boiler, 1.9 MMBtu/hr E-coat cure oven, 1.6 MMBtu/hr batch cure oven, 0.7 MMBtu/hr Burn off oven, 3.5 MMBtu/hr bake oven, and 39.7 MMBtu/hr aggregate input from various heaters used for building comfort.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Note that HAP emissions from natural gas combustion are negligible.

VOC emissions from the curing ovens that result from the drying of coatings are accounted for in the surface coating operations.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
PM and HAP Emissions
From Welding Operations
Company Name: Venture Technologies
Address City IN Zip: 53375 County Road 13, Elkhart, IN 46515
Permit #: T039-15364-00498
Reviewer: ERG/BS
Date: October 17, 2002

PROCESS WELDING	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)			
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn*	Ni*	Cr*
Metal Inert Gas (MIG) (carbon steel)	85	0.59	0.0055	0.0005	0	0	0.28	0.03	0	0
						Potential Emissions lbs/hr	0.28	0.03	0.00	0.00
						Potential Emissions lbs/day	6.62	0.60	0	0
						Potential Emissions tons/year	**1.21**	**0.11**	**0**	**0**

* Mn, Ni, and Cr are HAPs.

METHODOLGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

Appendix A: Emissions Calculations
Fugitive PM Emissions
Company Name: Venture Technologies
Address City IN Zip: 53375 County Road 13, Elkhart, IN 46515
Permit #: T039-15364-00498
Reviewer: ERG/BS
Date: October 17, 2002

Paved Roads

Maximum Vehicular Speed:	10	mph
Average Distance of Haul:	0.12	miles
Weighted Average Gross Weight:	26.7	tons
Number of One Way trips per hour:	3	trips/hour

Calculations:

E = k(sL/2)^0.65 * (W/3)^1.5

E =	Emission factor (lbs/vehicle miles traveled(VMT))	
k =	0.016	particle size multiplier for PM-10
	0.082	particle size multiplier for PM
sL	1.5	road surface silt content (g/m^2)
W	26.7	weighted average vehicle weight (tons)

source: AP-42, chapter 13.2.1, p. 13.2.1-6.

VMT= 481.8 (miles/yr)

PM

E = 1.805879 lbs/VMT

Potential PM Emissions (ton/yr) = Emission factor (lbs/VMT) * VMT / 2000 (lbs/ton)

Potential PM Emissions (ton/yr) = 0.44 tpy

PM-10

E = 0.352367 lbs/VMT

Potential PM-10 Emissions (ton/yr) = Emission factor (lbs/VMT) * VMT / 2000 (lbs/ton)

Potential PM-10 Emissions (ton/yr) 0.08 tpy